

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF MICHELLE A. PARFITT, ESQ.

Michelle A. Parfitt, Esq. hereby certifies as follows:

1. I am an attorney at law and senior partner at the law firm of Ashcraft & Gerel. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.
2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Dr. Kathleen Sutcliffe.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of Kathleen M. Sutcliffe, Ph.D. dated April 12, 2024.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Deposition of Kathleen Sutcliffe, Ph.D., dated May 28, 2024.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Harlow, et al., *Perineal Exposure to Talc and Ovarian Cancer Risk*, 80 *Obstetrics & Gynecology* 19 (1992).

6. Attached hereto as Exhibit 4 is a true and correct copy of the Cramer, et al., *Genital Talc Exposure and Risk of Ovarian Cancer*, 81 *Int'l J. Cancer* 351 (1999).

7. Attached hereto as Exhibit 5 is a true and correct copy of the Mills, et al., *Perineal Talc Exposure and Epithelial Ovarian Cancer Risk in the Central Valley of California*, 112 *Int'l J. Cancer* 458 (2004).

8. Attached hereto as Exhibit 6 is a true and correct copy of JNJ 000564377.

9. Attached hereto as Exhibit 7 is a true and correct copy of Gross & Berg, *A Meta-Analytical Approach Examining the Potential Relationship Between Talc Exposure and Ovarian Cancer*, 5 *J. Exposure Analysis Environ. Epidemiol.* 181 (1995).

10. Attached hereto as Exhibit 8 is a true and correct copy of JNJ 000000081.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Expert Report of Kathleen M. Sutcliffe, Ph.D., dated October 17, 2011.

12. I certify that the foregoing statements made by me are true. I am

aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: July 23, 2024

/s/ Michelle A. Parfitt
Michelle A. Parfitt